

# EXHIBIT E

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW  
JERSEY CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**This Document Relates to All Actions**

**DECLARATION OF ALBERTSONS LLC**

I, Michael Rando, being competent and over the age of twenty-one (21), state that I have personal knowledge of the following facts and hereby declare under penalty of perjury:

1. I am authorized to provide this declaration on behalf of Albertsons, LLC (Albertsons), one of the Pharmacy Defendants in the above-captioned proceeding.
2. I have worked at Albertsons for 17 years and am employed as Director of Business Information and Analytics (Merchandising) at Albertsons Companies, Inc. A brief overview of my duties as Director of Business Information and Analytics (Merchandising) include, but is not limited to, overseeing and working with the loyalty program(s) for Albertsons and its subsidiary stores.
3. In my capacity as Directors of Business Information and Analytics (Merchandising), I am familiar with the loyalty program database(s) at Albertsons.
4. I understand that the plaintiffs in this litigation are seeking production from the Pharmacy Defendants of front-of-store loyalty program member contact information in order to

attempt to cross-reference and supplement previously collected contact information for numerous specific individual patients from pharmacy patient dispensing databases.

5. To the best of my knowledge, Albertsons' pharmacy patient dispensing database is not linked to the company's loyalty program database. These are separate databases. Because the loyalty card program contact information is stored separately, it would be extraordinarily difficult and time consuming to attempt to cross-reference these sources of data, if feasible at all.
6. Albertsons' loyalty card numbers are attached to *households* rather than individuals and are not associated with pharmacy records. Among other data challenges, this means that a loyalty program household account may not be in a specific pharmacy patient's name or linkable at all. Albertsons accordingly has no quick or systematic method by which to cross-reference a pharmacy patient with a loyalty program account, and it may be unfeasible in many cases.
7. Even if Albertsons were able to link these separate and distinct sources of information, the contact information associated with the loyalty program account may not be the pharmacy patient's contact information. Rather, it could be the contact information for another member of the patient's household, it may be unavailable altogether, or it could be fake contact information provided when signing up for a loyalty program account.
8. Given that Albertsons has no systematic method to connect this information as explained above, any attempt to connect loyalty program data and the pharmacy patient dispensing database would be a voluminous and time-consuming manual process that is likely prone to substantial errors with little likelihood of a viable end-product.

Dated: June 22, 2023

**Michael Rando**

Michael Rando,  
Director of Business Information and  
Analytics (Merchandising)